

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT A

**JOINT MOTION TO DISMISS DEFENDANT
C.R. BARD, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and Defendant C.R. Bard, Inc. (“Bard”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third-party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs. Other Defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Richard B. North, Jr.
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(404) 322-6000

Attorney for Defendant C.R. Bard, Inc.

/s/ Caroline L. Maida
MOSTYN LAW FIRM
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(713) 714-0000

Attorney for Plaintiffs on Exhibit A

Dated: May 29, 2018

EXHIBIT A – MOSTYN LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-cv-07319	Diana Pense and Roger D. Pense v. C.R. Bard, Inc., et al.
2:13-cv-22641	Lonny Evans v. C.R. Bard, Inc., et al.
2:14-cv-21827	Susanne Eschler v. C.R. Bard, Inc., et al.
2:15-cv-15962	Judith A. Harman and Robert B. Harman v. C.R. Bard, Inc., et al.

CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.